



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

p. 1 of 2

Report of Observations

Type of Inspection/Observations: Complaint Follow-up Date 9/4/97

Facility Name: A-1 Plating 311 S. Haven St. Balto.

Remarks:

Mr. Paul Stancil of Env. Crimes Unit had visited this company on this date and had found drums of zinc cyanide sludge and liquid stored improperly.

I met with David Nauman of the company who reported that within the last 30 days he has been involved in repackaging zinc cyanide sludge from deteriorated drums, into new drums for disposal.

On the north side of the plant, adjacent to a roll-off box containing F006 sludge, Mr. Nauman has placed about 19 drums of zinc cyanide sludge and 8 drums of other plating waste. He has been repackaging the waste in new, open head drums, and decanting the liquid into a pallet ("tote tank") tank. This work is being done on an unpaved part of the lot. These drums were originally stored inside on a drum storage rack, where the atmosphere corroded the drums. Two of the drums into which the solids were repackaged has been found to be leaking. The drums of zinc cyanide sludge originated from plating solutions which were stored for re-use, according to Mr. Nauman and Mr. Jim Lorange. These materials would be classified as F008 hazardous waste. Several of the drums have hazardous waste labels, which are filled in with the information "D002, F008", "zinc cyanide sludge".

In addition an intermodal container holds about 30 drums, including zinc cyanide sludge, silver cyanide, nickel solution. This container could not be entered to get a complete inventory.

Observer: Douglas E. Frantz Person Interviewed: David J. Nauman



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Facility Name: A-1 Plating

Remarks:

Inside the plant, near the zinc cyanide plating line, is a steel tank, estimated 300-500 gallons holds additional zinc cyanide plating solution and sludge (about $\frac{2}{3}$ full). This is reported by Mr. Nauman to be solution which was removed from the line and stored here. This tank has a 12 inch plastic pumping pipe which leads to the roof. Mr. Lorenzo did not know the ~~part~~ purpose of this pipe, but said that it was left there from the former use of the tank as part of a Chrome plating line.

On the roof, a section of the plastic pipe or duct was found to be disconnected and laying on the roof. A white powdery deposit was inside one end of the pipe. Mr. Nauman had been cleaning up this pipe and residue when I arrived, in accordance with the instructions of Mr. Stancil.

I sampled two drums in the outside area where the drum waste is being repackaged. One sample (DEF 148) was of crystalline material in a new drum. One sample was taken of a drum half full of liquid and sludge/trash. The sludge material was collected (DEF 147).

Inside, a sample (DEF 149) was taken of crystalline solids from the large tank. On the roof a sample was taken of the powder inside the length of pipe. (DEF 150). All samples were 8 oz. jars.

The zinc cyanide drums are not full. This is why the company was repackaging them to save on disposal charges.

Observer: Douglas E. Frantz Person Interviewed: Dave Nauman



STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3386x 3400

p. 1 of 2

SITE COMPLAINT

NUMBER SC-O-98-006 DATE 9/4/97

1. Name of violator: A-1 Plating Company, Inc.
Address: 311 S. Haven Street
County: Balto. City Phone: 410-327-5552

2. Violation Type (with reference to the Annotated Code of Maryland)

- Water Pollution Control and Abatement (Environment Article, Sections 9-301 through 9-344)
 Oil Control (Environment Article, Sections 4-401 through 4-418)
 Controlled Hazardous Substances (Environment Article, Sections 7-201 through 7-268)
 Landfills and Sludge Disposal (Environment Article, Section 9-204)
 Other

3. Specifically: Zinc cyanide solution and sludge (Foot, Foot)
stored without a permit, and without labeling, accumulates,
dates, and secondary containment. Some drums were
uncovered. Other plating chemicals stored without secondary
containment and proper labeling. At least two drums
are leaking to the ground.

4. You are hereby advised the following corrective actions are necessary. Compliance with the corrective actions contained herein does not preclude the Department from imposing further requirements. In addition, the Department reserves the right to impose sanctions or penalties for the underlying violation(s).

① Bring storage of waste into compliance with COMAR 26.13.03.05E,
i.e. placed waste in DOT-approved containers, label properly with
accumulated date, and hazardous waste label. Provide (cont.)

5. The above described violation(s) may result in the Department seeking legal sanctions against you, including the imposition of civil and/or criminal penalties. Continuation of the violation(s) or failure to take the corrective actions described above may result in additional sanctions or penalties.

6. "I hereby acknowledge receipt of this Site Complaint by my signature, which is not an admission of guilt".

Person issued to: Dave J. Nishida Title:

Authorized by: Jane T. Nishida
Secretary
Department of the Environment

Issued by: Douglas E. Frantz
Inspector
Phone: 410-631-3400



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Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Site Complaint (cont.)
Report of Observations

p. 2 of 2

SC-0-98-006

Date 9/4/97

Type of Inspection/Observations:

Facility Name: A.I. Plating

Remarks:

secondary containment for waste containers.

- (2) Inventory all waste containers and provide a copy of the inventory to the Hazardous Waste Enforcement Division.
- (3) Immediately make arrangements for disposal of all hazardous wastes.
- (4) Handling of hazardous waste (for repackaging, etc.) must be done in a place and in a manner so that contamination of the environment does not occur and so that human health is not endangered. Repackaging should be done with provisions for spill containment.

Observer: Douglas E. Frantz

Person Interviewed:

Dave Hansen



State of Maryland
Department of the Environment
Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

CASE # _____

Report of Observations

Type of Inspection/Observation: Follow-up Date 9/17/97

Facility Name: A-I Plating - 311 S. Haven St.

Remarks: met w/ Dave Naumann

Clean-up of area near roll-off container is nearly complete. Mr. Naumann has repackaged most of the zinc cyanide sludge drums, separating the liquid from crystals and sludge. The liquid is contained in two 250 gallon tote tanks, one full and one about half full. This material will be sampled and analyzed for possible re-use in the zinc plating line. If it is not useable, it will be disposed as waste. Sludge and crystals have been placed in 8 x 55 gallon open-head drums, all of which are labeled with hazardous waste labels.

Mr. Naumann had not yet written an accumulation date on the drums, since he was not sure what date to use. I told him to use the date on which the material was determined to be hazardous waste. Two more sludge drums remain to be repackaged. One drum of tin-lead solution will be processed through the company's treatment system. One drum contains contaminated trash. There are four drums of contaminated drum liners which need to be cut up and repackaged for shipment. The first shipment of hazardous waste is expected to occur next week.

A-I will begin constructing a temporary secondary containment area this week, using lumber and several thicknesses of plastic. The tote tanks and drums will be stored in this area until disposed of. Results from analysis of liquid in tote tanks should be available within 5 days after lab (Ashley) receives samples, & photographed the storage area and the area where the drums were originally stored.

TIME IN: 09:55

TIME OUT: 10:15

Observer: Douglas E. Frantz

Person Interviewed: Dave Naumann

**Maryland Department of the Environment
Waste Management Administration
Hazardous Waste Program
Hazardous Waste Enforcement Division**

M E M O R A N D U M

To: File, A-1 Plating

From: Doug Frantz *DF*

Subject: inspection

Date: Oct. 21, 1997

On this date, I inspected this company to confirm compliance with the Site Complaint issued on Sept. 4, 1997. Dave Naumann of the company accompanied me. There are twelve 55 gallon drums stored on the loading dock which consist of F008 cyanide solids, and which are labeled as hazardous waste. These drums came from the repackaging of drums stored in the intermodal container. Four additional drums contain solids from the interior plating tank which was used to store zinc cyanide sludge. The liquids from the tank are stored in a tote tank (est. 30 gallons) which is to be placed into the temporary secondary area on the loading dock until analytical results are received. Inside the process building, there is one additional drum, half full of trash and solids from the tank. The tank itself is empty, but Mr. Naumann plans to scrape the sides and bottom of the tank to remove any remaining residue. The piping from the tank which was used to heat the contents has been removed. This piping is laying on the floor nearby and will be cut up and disposed as cyanide contaminated waste.

Two full tote tanks (250 gallons each) are stored in the temporary secondary containment area on the loading dock. Mr. Naumann gave me a copy of correspondence from Ashley Laboratories which indicates that the first tank can be reused as plating solution, which the addition of several chemicals. Results from sampling of the second tank are pending.

The remaining cyanide sludge drums are expected to be shipped for disposal by the midle of November. At this time, all the cyanide waste is repackaged in DOT-approved containers, properly labeled, and stored in secondary containment, where appropriate.

Maryland Department of the Environment
Waste Management Administration
Hazardous Waste Program
Hazardous Waste Enforcement Division

M E M O R A N D U M

To: File, A-1 Plating

From: Doug Frantz *DF*

Subject: inspection

Date: Sept. 29, 1997

I met with Dave Naumann of the company on this date to review the progress on complying with the Site Complaint. The drums which were stored in the intermodal container have been removed and those containing cyanide material have been stored on the loading dock. These include 17 drums of mixed solid and liquid wastes and 2 drums containing contaminated liners. Mr. Naumann has placed the pallets containing the drums on sheets of heavy polyethylene plastic. The plastic has been pulled up around the drums and another sheet placed over the top of the drums to protect them from the rain. The repackaging of these drums is the next priority, and this will be done in the same way as the previous drums of cyanide waste, separating the solid material from the liquid. Solids will be placed into new DOT approved drums, and the liquid into tote tanks. Three cyanide waste drums removed from the intermodal container contained only liquid and were pumped into one of the tote tanks. Both of these tanks stored in the temporary containment area are now nearly full.

There are drums of non-cyanide material still stored in the intermodal container. These include 1 x 30 gal. of nickel solution, 1 x 55 gal. and 1 x 30 gal. of caustic, and 1 x 30 gal. of contaminated trash. There is also 2 x 55 gal., 1 x 30 gal., and 1 x 15 gal., all with acids, and 1 overpack drum of undetermined contents. The acid and caustic material is to be processed through the plant's wastewater treatment system.

Mr. Naumann reported that except for removing the plastic ductwork, the tank of zinc cyanide liquid and solids inside the plant has not been disturbed.

Maryland Department of the Environment
Waste Management Administration
Hazardous Waste Program
Hazardous Waste Enforcement Division

M E M O R A N D U M

To: File, A-1 Plating

From: Doug Frantz *DT*

Subject: inspection

Date: Sept. 22, 1997

On this date I met with Dave Naumann of the company to review the progress on complying with the Site Complaint issued on Sept. 4. Six to twelve inches of soil has been removed from the area near the roll-off dumpster where the drums of zinc cyanide sludge and liquid were stored. This soil has been placed into the hazardous waste roll-off which is used to accumulate F006 sludge from the waste water treatment process. A sample has been sent for analysis.

A temporary secondary containment area has been built on the raised loading dock, using lumber and heavy gauge polyethylene sheeting. The area is covered by a wooden framework supporting a plastic tarp roof and sides to prevent rainfall from entering the containment area. The two tote tanks of zinc cyanide solution are stored in the containment area.

While I was present, Stablex arrived to pickup twelve drums of zinc cyanide solids. These drums were stored on the loading dock, with hazardous waste labels and DOT labels attached.

The same drums as before remain stored in the intermodal container. The ductwork from the roof is also stored in the container. Mr. Naumann intends to remove the chemical deposits from the duct, and rinse any remaining residue from the duct. The duct will then be disposed as solid waste, and the residue and rinseate held for disposal as hazardous waste.

**RCRIS MAINTENANCE FORM FOR
STATE AND EPA UNIVERSE INFORMATION**

EPA ID M D D 0 0 3 1 0 1 8 4 7

Facility Name A-1 Plating Co

Waste Activity/Source	Type	RCRA Reg Status	RCRA Reg Description	Notification Date
Generator	E	_____	_____	_____
	N	I	R	4/18/92
TSD	E	_____	_____	_____
	N	_____	_____	_____
Transporter	E	_____	_____	_____
	N	_____	_____	_____
Burner	E	_____	_____	_____
	N	_____	_____	_____

Process Code Information

Source **E** or **S** (circle correct one)

PROCESS CDE/SEQ	COMM AVAIL	AMT TYPE	STATUS	AMOUNT	UOM	NO. OF UNITS	REPORT DATE
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

<input checked="" type="checkbox"/> IR Inspection report	<input type="checkbox"/> Affidavit from the facility
<input type="checkbox"/> Revised Notification from the state	<input checked="" type="checkbox"/> Affidavit from the state
<input type="checkbox"/> Revised Notification from the facility	<input type="checkbox"/> Biennial report
<input type="checkbox"/> EPA clean closure certificate	<input type="checkbox"/> Documentation not required
<input type="checkbox"/> State documentation certifying clean closure	
<input type="checkbox"/> Other	
Date to CSC <u>JAN 20 1993</u>	
Batch # <u># 51</u>	
Date QA'd <u>2/4/93</u>	



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ENFORCEMENT PROGRAM
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BALTIMORE, MARYLAND 21224
(301) 631-3400

SPG

FI _____ Inspector: _____ Date: _____

GENERATOR CHECKLIST

Facility Name: _____

Address: _____

Facility Representative: _____ Telephone No.: _____

Description of Work Activity: _____

EPA Identification Number? _____

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR
26.13.02.10 - .19?..... Yes No
If yes, under which category is the waste?

Ignitable Corrosive Reactive EP Toxic RCRA Listed

2. Describe the amount of waste generated (day, week or month).

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?..... Yes No
(If no, do not complete sections B and C)
2. Does generator use manifest?..... Yes No
If no, explain: _____
3. Does generator retain copies of manifests?..... Yes No N/A
If yes, does the manifest include the following information?
(26.13.03.04C)
- Manifest document number?..... Yes No N/A
 - Generator's name, mailing address and telephone number?..... Yes No N/A
 - Generator's EPA I.D. number?..... Yes No N/A
 - Transporter name(s) and EPA I.D. number(s)?..... Yes No N/A
 - Designated TSDF name, address, and EPA I.D. number?..... Yes No N/A
 - Alternate TSDF name, address, and EPA I.D. number?..... Yes No N/A
 - Instructions to return waste to generator if undeliverable?..... Yes No N/A
 - Description of the waste required by DOT regulations?..... Yes No N/A



- Quantity of each hazardous waste by units of weight or volume?.... Yes No N/A
-Total number and types of containers given to transporter?..... Yes No N/A
-Is the proper certification noted on each manifest?..... Yes No N/A
4. Has the generator signed and dated manifests (26.13.03.04E)?..... Yes No N/A
5. Did the generator obtain initial transporter's signature and date of acceptance?..... Yes No N/A
6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?..... Yes No N/A
7. Have manifests been retained for three years?..... Yes No N/A

Section C - Pre-Transport Requirements (26.13.03.05) N/A

1. Does generator package wastes in accordance with DOT requirements?.... Yes No
2. Are containers in good condition?..... Yes No
If no, explain: _____
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?..... Yes No
4. Is period of accumulation less than 90 days?..... Yes No
-If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?..... Yes No N/A
-If no, explain: _____
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?..... Yes No N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?..... Yes No N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
-Manifests and signed copies from designated facilities?..... Yes No
-Annual Reports?..... Yes No
-Exception Reports?..... Yes No N/A
-Waste Analyses?..... Yes No N/A

Section E - Special Conditions (26.13.03.07)

1. Has the generator received from or transported to a foreign country any hazardous waste(s)?..... Yes No
-If yes, has a notice been filed with MDE and EPA?..... Yes No N/A
-Is this waste manifested and signed by a foreign consignee?..... Yes No N/A
-If generator transported wastes out of the country, has confirmation of delivery been received?..... Yes No N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?..... Yes No
If yes, do they include: *Training on applicable regulations, handling and disposal procedures, emergency response, and spill control.*
-Job title and written job description of each position?..... Yes No
-Description of type and amount of training?..... Yes No
-Records of training given to facility personnel?..... Yes No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?..... Yes No

2. Is the facility equipped with:
 - a. Internal communication or alarm system?..... Yes No
 - b. Telephone or two-way radio to call emergency response personnel?..... Yes No
 - c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?..... Yes No
 - d. Water of adequate volume for hoses, sprinklers, or water spray system?..... Yes No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?..... Yes No
4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility?..... Yes No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?..... Yes No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?..... Yes No N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?..... Yes No
If yes, does contingency plan include:
 -Arrangements with local emergency response organizations?..... Yes No
 -Emergency coordinators' names, phone numbers, and addresses?..... Yes No
 -List of all emergency equipment at the facility and description of equipment?..... Yes No
 -Evacuation plan for facility personnel?..... Yes No
2. Is there an emergency coordinator on site or on call at all times?..... Yes No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?..... Yes No
4. Has the plan ever been implemented?..... Yes No
-If so, was the plan appropriate?..... Yes No N/A
 If the plan was not appropriate, has it been amended?..... Yes No N/A
-If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?..... Yes No N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?..... Yes No
2. Is container made of a material that will not react with the waste which it stores?..... Yes No N/A
3. Are containers always closed when holding hazardous waste?..... Yes No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?..... Yes No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?..... Yes No
6. Do container storage areas have adequate containment systems?..... Yes No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?..... Yes No N/A
8. Are incompatible wastes or materials placed in the same containers?.... Yes No N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?..... Yes No N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?..... Yes No N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?..... Yes No
If yes, do reports contain the following information?
a) Name, address and EPA I.D. number of facility?..... Yes No
b) Date and year covered by report?..... Yes No
c) Description/quantity of hazardous waste?..... Yes No
d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?..... Yes No
e) Certification signed by owner/operator?..... Yes No

Section G - Other Checklists Completed: _____ N/A

- ____ Tanks
____ Transporter
 Land Disposal Restrictions
____ TSD Facility
____ Surface Impoundment
____ Waste Pile
____ Land Treatment
____ Landfill
____ Incinerator
____ Thermal Treatment
____ Groundwater Monitoring
 WASTE MANAGEMENT

Section H - Additional Comments

To: Director of Inspection

____ I am pleased to inform you that the facility has made significant improvements in waste management and pollution prevention. The facility has implemented a new waste minimization program, which has resulted in a 10% reduction in waste generation over the past year. The facility has also invested in state-of-the-art pollution control equipment, including a new air pollution control system and a water recycling system. These improvements have contributed to the facility's overall environmental performance.

To: Director of Environmental Health

____ I am pleased to inform you that the facility has made significant improvements in waste management and pollution prevention. The facility has implemented a new waste minimization program, which has resulted in a 10% reduction in waste generation over the past year. The facility has also invested in state-of-the-art pollution control equipment, including a new air pollution control system and a water recycling system. These improvements have contributed to the facility's overall environmental performance.



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2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: Generation ID# 0031018417 Date 6/18/92

Facility Name: A.T. PLATING CO.

Remarks: In regards to waste generation and accompanied me during my inspection of the facility.

III Current Operations

To whomsoever above, Mr. Neumann is the owner and operator of A.T. Plating. Mr. Neumann has been the President of the company since 1964. All correspondence to the facility may be addressed to the present facility location: "A.T. PLATING, 311. SOUTH HOWARD ST. BALTIMORE MD, 21224.

IV Facility Description

A.T. Plating is an older plant as well as one of initial operators. Presently, they still do not have a solution to their aqueous and incineration tanks, lime, zinc dust and a small quantity of Cadmium. The plating is performed within the number of solution tanks. The plating bath solutions are maintained separately within two separate rooms, one each for hot bath and hot bath. This tank also contains an anodizing process which an oxidation solution (black oxide) which is applied on a dark and smooth finish on any metal.

A.T. Plating also maintains a warehouse and an industrial supply site. Some antibiotic solutions are maintained in the storage of facility product, empty containers and waste! (see Section IV below).

V Non-Hazardous WASTE STREAMS.

A major portion of the non-hazardous waste products of this site, the Anodizing bath contains general run off black oxide anodizing process (Cleaning of metal scrap) and possibly other wastes are also produced.

Observer: George W. DeGris

Person Interviewed:

6/19/92



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA Generator Date 6/16/88

Facility Name: A.I. PLATING, INC. HAZARDOUS WASTE STREAM

Remarks: A. I. Plating contains one hazardous waste stream consisting of a zinc plating waste stream. This waste stream is generated via the treatment of spent electroplating bath solutions as described below, and as a result has been designated as an RCRA hazardous waste stream.

Plastic containers are employed for the electrolysis of specific metal components or by specific metal parts (Ref. zinc). These "Plastic tanks" are treated with a pH adjustment to facilitate oxidation of the bath solution in a stainless steel tank at 100°F. An approximate time is 500 P.M. units. The tanks are recycled after the solutions change the type of treatment. Immobilization is done by adding the electrolyte of specific components in a acid bath at 100°F. The tanks are treated with a solution to reduce the lead content (Ref. to the last line) and common acid bath and lead reduction in P.H. to approximately 20 STD units. Zinc Oxide and Chlorine - Zinc Chloride are immobilized in the acidic medium at the treatment components.

All treated waste solutions, chromium solutions and Zinc Chloride removal are discharge rate a unit for final pH adjustment for nitrate precipitation. A coagulant and flocculant are added to assist with precipitation at the filter. From this point, the liquid portion - "clarified effluent liquid" is directed into the City of Baltimore municipal system. The filtered water supply is passed through a sand filter; the liquid passes through the filter to the filter pump. Any remaining liquid is collected as feed into the pluvial flow system. The pluvial water supply is then passed to the filter pump. Any remaining liquid is collected as feed

Observer: Cuyon R.W. Deper

Person Interviewed: E. G. L.



State of Maryland
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Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: RCRA Generator Date 6/18/92

Facility Name: A-T PLATING CO., 311 S FLUEN ST. BALTIMORE, MD, 21224

Remarks: Above. The chlorine bludgeon is fully immersed
in the brining waste. The chlorine bludgeon is three
feet long by four inches wide by one inch thick ($\pm 2'' \times 2'' \times 1''$)
and is located within a hopper which is placed beneath
the filter press unit.

VII. HAZARDOUS WASTE MANAGEMENT

As discussed within above, the chlorine litter
cans are periodically removed from the collector hopper
as needed. The waste is then managed within a $\pm 25\text{yd}^3$
roll off collection unit which is stainless steel. The
roll off unit is completely covered with a heavy plastic
(polymer) cover. The cost is estimated in such a way as
to insure that rainwater does not collect on top of the
roll off unit but is discharged from it. Consider
the fact that water is channeled away from the waste
container and the fact that the chlorine is dry
upon being placed into the roll off unit, and ^{secondly} no
leakage or overflowing, as acceptable without OARR 20-1305.
894 (4) (b) (ii) statement. In case of a white reinforced steel.

During the time I conducted the inspection
of facilities and facilities above the, I did not see
that this report. All activity below bludgeon within the
chlorine bludgeon unit was clean to the touch. I observed
no leakage or discharge. Discharge of the chlorine unit
and tanks. In the case of discharge, the chlorine
unit connects via the wastewater treatment system to
discharge into the Municipal sewer system. The discharge
is collected under the terms of a Municipal Permit #4-0645.
Mr. Baumann showed me the area in which the chlorine
system discharges the liquid into the sewer. However the
below grade area was covered with a metal plate which
prevents backwash of the discharge. According to Mr.
Observer: Clyburn R. Jones Person Interviewed: C. S. J.



State of Maryland
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Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: HAZARDOUS WASTE

Date 6/18/92

Facility Name: A. I. PLATING CO., 3115 HAVEN ST. BALTIMORE MD. 21224

Remarks: Neumann, the owner which is under lock and key
can only be opened by the city of Baltimore.

I arrived to inspection of the facility
yesterday. The 254¹³ ton of sludge was reported to be acid, however the date of accumulation was not clearly marked and I was unable to discern it. According to Mr. Neumann, water was removed from the site just recently and that only several loads of the sludge were sent to be transported to the yell off from the apartment since the date of removal. (TDS SECTION 3 "Record Review"). I observed several locations of drum storage during my inspection of the yard. In one area I observed approximately 1000 empty 55 gallon drums positioned on the ground. According to Mr. Neumann the drums were to be sent for recycling and adjacent to the empty drums I observed an elevated concrete platform, constructed by storage purposes. Located on this platform I observed 7 empty, 55 gallon vinyl drums marked as primarily containing either sulfuric or hydrochloric acid. 3 bushes of orange drums, partially containing hydrochloric acid and hydrofluoric acid; 10 empty 55 gallon drums marked as primarily containing lubricating oil. Eight empty 55 gallon vinyl drums marked as originally containing an emulsion of the acid and caustic solution.

I observed no discoloration or evidence of recent spillage in any of these areas or from any of the aforementioned containers. All structures observed were clean and in satisfactory condition.

JULY

RECORD REVIEW

During this portion of the inspection I reviewed all applicable documents of manifest, Final Report, Notifications, Inspections, Test Information, Corrective Plans, Owner's Report of Recovery Plan, and Budget from Observer Eugene M. Jones Person Interviewed: OGD



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: HICHA GENERATOR Date 6/18/92

Facility Name: A. J. WHITING CO., 311 S. HAVEN ST. BALTIMORE, MD. 21224

Remarks: The following manifests outline hazardous waste shipments from 3/13/90 to the present: 1) MANIFEST # PNC-0469232, SHIPMENT DATE (SD) - 3/13/90, TSDAID - 6/28/90, 1CM 25YD³ - 17,280IBS (FOOD) 2) MANIFEST # PNC-0469243 SD - 6/28/90, TSDAID - 6/28/90, 1CM 25YD³ FOOD - 18,060IBS. 3) MANIFEST # MOC C295717, SD - 3/25/91, TSDAID - 3/26/91; 1CM 25YD³ FOOD 32,340IBS. 4) MANIFEST # PNC064375470, SD - 10/7/91, TSDAID - 10/8/91, CRM E - NA 9189, 1CM 25YD³ FOOD 22,380IBS 5) MANIFEST # PNC 5587993, SD - 1/28/92, TSDAID - 1/28/92, 1CM, 25YD³ FOOD - 13,800IBS 6) MANIFEST # PNC 6198032, SD - 6/8/92 TSDAID - 6/8/92, 1CM, 20YD³ FOOD, 17,560IBS. As per shipment # 1-4, as outlined above, the transporter of each was Delaware Container of Baltimore, MD. (PAN 664375470). The TSDF facility were also used & were initially managed was Proctor Corp., 1600 PENNA. AVE., TERR PAK (74104) TSD # PAN 0101541045. As per shipments #5 and #6 as described above, Granite Corp. provided both the transporter and TSDF services.

A. J. Whitling Company submitted a hand
physical justification form for each manifest as described
above. Each justification contained all necessary general
information including the generator's name, EPA ID#,
address and manifest #. That justification outlined
the appropriate EPA waste code - "Food" and compatibility
group - "Nonwastewater". "Compatibility information per
40 CFR" outlines the regulations within Part 268 where
the applicable treatment standards may be found - i.e:
Part 268-11^{2d} and 268-43(a) - however the waste
constituents and reasonable treatment standards are not
documented. The justifications did outline, within
Section #3, that the waste must not exceed the appropriate
standards and disposal must be made prior to final disposal.

Observer: George W. K. Hall

Person Interviewed: John R. Lewis



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: NON-PENALTIES Date 6/16/1982

Facility Name: A. Z. PLATING CO., 3115 HUNTER ST., BALTIMORE, MD. 21224

Remarks: Based upon the facility's knowledge of the waste producing process and recent trash stream - FO06, the operator has assumed that there are no RCRA regulations or standards within the waste stream.

The Contingency Plan, as is currently documented, was submitted to the Administration during Project #124, as of the, January 20, 1982 to the Administration and was submitted to the facility during Project #124. The Plan includes all required information regarding spill prevention and emergency procedures and equipment and a diagram which outlines the evacuation plan. As such, the Contingency Plan outlines all areas addressed within Comar 26.13.03.04, as required at Comar 26.13.03.05E(1)(e). Personnel listed in the Contingency Plan, communications and equipment are maintained as per the provisions of Comar 26.13.05.03, PREPAREDNESS AND PREVENTION.

(1) A facility has formulated a documented program of personnel training as outlined within Comar 26.13.05.02C, as required at Comar 26.13.03.05E(1)(e). The personnel training is documented within the facility's "Annual Communication Program". This program includes, Right to Know Training, Waste Handling Training, Safety Policies training, Emergency Plan and Emergency Procedure training, "Awareness and Education" requirements. Within the section titled "Education Requirements", descriptions of initial training, annual training, Emergency Equipment Training and training of documentation are included, as per Comar 26.13.05.02C (1)(2)(3)(4) and (5).

The facility maintains a daily inspection log which details inspection of the hazardous waste storage area. The log includes pick up by disposal from tanks if off dumpsite.

Observer: George W. McNeil

Person Interviewed: E.D.S.



State of Maryland
Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observations: HAZARDOUS WASTE GENERATOR Date 1/16/92

Facility Name: A. I. Platting Co., 311 S. Havre St. Balt. MD. 21224

Remarks: no closed landfills or tanks.

From 1987 to the present date, the rate of hazardous waste generation has remained ~~constant~~ ^{within} no more than 10% monthly treatment capacity to reduce metal concentrations within the wastewater effluent to within the maximum permit limitations. Chromium metal compounds are no longer plated onto the metal parts. The quality of the wastewater treatment effluent has changed considerably quantities have not been reduced.

TS

Correspondence to EPA.

1) Generation Checklist and Report of Observations (P1-1).

2) "EVALUATION - VIOLATION - ENFORCEMENT FORM I & II"

3) "PRE INSPECTION WORKSHEET (EXHIBIT 2-3)"

4) "GENERAL SITE INSPECTION INFORMATION FORM (EXHIBIT IV-1)"

5) "LDR CHECKLIST FOR GENERATORS" (P1-6)

6) MANIFESTS # PER6178032, PNC 5587993, MNC 0295718

7) "A-2 Permit Approval, Inc. HAZARD COMMUNICATION PROGRAM".

Observer: Raymond W. Dillipak

Person Interviewed: C. E. B.

P 11 OF 11

A-1 PLATING CO.
MDP003101847

EXHIBIT 2-3. PRE-INSPECTION WORKSHEET

Date
Completed

Description of Activity

6/15/92 Complete and verify the general information section of the inspection report

Identify and obtain all relevant information:

6/16/92 Manifest history

6/16/92 Notification form

N/A Part A permit application

6/16/92 Previous inspection reports

Ref. 15/92 Correspondence

N/A Part B permit application (if available)

6/15/92 Annual reports

6/15/92 Other

Assemble inspection package:

6/17/92 Notification form

N/A Part A permit application

6/17/92 Previous inspection reports

6/17/92 Waste generation and characterization information

6/17/92 Information from air and water pollution control agencies or offices

6/17/92 Inspection checklists

6/17/92 Copies of State statutes and regulations or Federal laws and regulations

6/17/92 Safety equipment

6/17/92 Camera and film

6/17/92 Agency identification card

6/18/92 Sampling equipment (if necessary)

6/18/92 Other

Scheduling the investigation:

N/A Letters of intent to visit/inspect

6/15/92 Establish date(s) of the inspection

N/A Follow-up telephone call to confirm date(s) of the inspection and request additional information be made available upon inspection

6/17/92 Complete inspection plan

6/17/92 Other

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name

B. Street (or other identifier)

A-1 PLATING COMPANY311 S. HAVEN ST.

C. City

D. State

E. Zip Code

F. County Name

BALTIMOREMARYLAND21224BALTIMORE C. T.Y.

G. Site Operator Information

I. Name

A-1 PLATING CO.

2. Telephone Number

(410) - 327-5552

3. Street

311 S. HAVEN ST.

4. City

BALTIMORE

5. State

MD

6. Zip Code

21224

H. Site Description

ELECTROPLATING, ANODIZING AND METAL FINISHING

I. Type of Ownership

1. Federal 2. State 3. County 4. Municipal 5. Private

J.

 1. Generator 2. Transporter 3. Treatment 4. Storage 5. DisposalK. Regulatory Status N/A1. Interim Status 3. Part B Permit Application Submitted2. Permitted Facility; 4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name

EUGENE DEJOIE

3. Organization

MDE/HSWMA/HWED

2. Title

SANITARIAN

4. Telephone No. (area code and No.)

(410) 631-3400

M. Inspection Participants

FACILITY REPS.1. JOHN NAUMAN

6.

2. GARY REYNOLDS

7.

3.

8.

4.

9.

5.

10.

A1 PLATING

MOP003101 847

INSPECTOR: EUGENE DEJESSE

LDR CHECKLIST FOR GENERATORS

261.20 - 261.24

1. Does the facility generate any "characteristic" hazardous waste?

Yes No

If yes, circle the appropriate one(s)

N/A

D001 D002 D003 D004-D017 D018-D043*

* Newly listed - not yet subject to LDR regs

55 FR 22534(O) (6/1/90)

2. Does the facility generate any hazardous waste that is a liquid and either contains over 50 ppm of PCB, over 1000 ppm of HOCs and has an unrelated characteristic property, or is a characteristic waste containing over 134 ppm of nickel and/or 130 ppm of thallium (ie relevant descriptors of old California List wastes)?

Yes No

261.30 - 261.33

3. Does the facility generate any "listed" hazardous waste?

Yes No

Circle the appropriate code(s)

F K P U

268.5 & 268.6

4. Is any of the facility's waste subject to an LDR exemption, waiver, delisting or national capacity variance? Yes No

If yes, describe which and obtain documentation:

262.11(c) 55 FR 22530(B.2) (6/1/90) 268.9(a)

5. Does the facility (a) test its waste or (b) apply knowledge of its waste to determine whether its listed waste exhibits a characteristic of hazardous waste?

Yes No N/A

If yes, circle (a) or (b)

A-1 PLATING
110003101847
EUGENE DE TORE

268.7(a)

6. Does the generator (a) test its waste(s) or (b) use knowledge of the waste(s) to determine if it is prohibited from land disposal (ie does not meet applicable treatment standards)?

Yes

No

If yes, circle (a) or (b)

268.7(a) 55 FR 22535(P) (06/01/90)

7. If testing of waste is performed, does the facility do a total waste analysis where required and/or a TCLP waste extract analysis where it is required? Yes No N/A

268.7(a)(1) 268.32 268.40 - 268.43

8. Does the facility's hazardous waste(s) exceed the applicable treatment standards upon generation? Yes No N/A

51 FR 40606(V) (11/7/86)

9. If the facility generates waste containing any of the organic solvents listed in the F001 - F005 waste codes, were those chemicals used for or did the waste result from their solvent properties (ie degreasing, dissolving, cleaning, solubilizing, etc.)? Yes No N/A

If N/A, skip to question 12

If no, what were these chemicals used for? Describe below:

N/A

- N/A 10. How did the facility classify the waste containing the organic solvents listed in the F001 - F005 waste codes (circle the appropriate waste code)?

D001 TC F001 -F005 P or U Other(describe)

A.I PLATING
MDR 003101 847
EUGENE DeJoice

N/A11. Is there any evidence that solvent waste was misclassified?

Yes No

If yes, describe

268.2(f) 268.41 - 268.43

12. Does the facility analyze its waste for TOC and TSS to determine proper treatability group (ie wastewater or non-wastewater) or in the case of D001, proper waste subcategory)?

Yes No N/A

If no, describe below how this determination is made:

13. Does it appear that any other restricted waste was misclassified or placed in the wrong treatability/sub-category group? Yes No

If yes, describe:

14. Does the facility, in any way, mix/aggregate/dilute any of its restricted hazardous waste with another hazardous waste, non-hazardous waste or non-waste material prior to (1) storage, (2) treatment or (3) disposal? Yes No

If no, skip to question 18

If yes, circle (1), (2) or (3) as well as the appropriate one below:

- a) D001 - D003 non toxic characteristic waste (NTCW) mixed with non-hazardous waste or non-waste material
- b) NTCW mixed with another NTCW

A-1 PLATING
MDR 003101847
EUGENE Detorre

- c) NTCW mixed with D004 - D017 toxic (EP/TC) characteristic waste (TCW)
- d) NTCW mixed with F,K,P or U listed hazardous waste (LW)
- e) TCW mixed with non-hazardous waste or non-waste material
- f) TCW mixed another TCW
- ✓/A g) TCW mixed with LW
- h) LW mixed with non-hazardous waste or non-waste material
- i) LW mixed with another LW

268.3 55 FR 22537(d.1) (6/1/90)

- ✓/A 15. Based on the above and any other observations, does it appear that the facility is using dilution as a substitute for appropriate/legitimate treatment or to improperly switch treatability group (ie wastewater vs non-wastewater)?

Yes No

If yes, describe as necessary:

268.41(b) 268.43(b) 55 FR 22537(c.2) (6/1/90)

- ✓/A 16. In the case of a mixture of listed wastes, does the facility recognize that the most stringent standard for a particular constituent is the one that applies? Yes No N/A

55 FR 22536(b)

- ✓/A 17. In the case of a mixture of wastes with both concentration level treatment standards and specified treatment technology, does the facility recognize that both must be achieved?

Yes No N/A

268.9(b)

18. Where waste or waste mixtures have both characteristic and listed waste codes, does the facility recognize that the treatment standard associated with each characteristic and listed waste must be met unless the characteristic constituent is specifically addressed in the treatment standard for the listed waste?

Yes No N/A

A-4 PLATING
MRD003 61847
EUGENE DeVosse

268.9(d)

19. Does the facility send treated characteristic waste (ie meets necessary treatment standards) to a Subtitle D landfill?

Yes No N/A

If yes, is a copy of the notifications and certifications sent to the EPA Regional Administrator? Yes No

20. Does the facility generate lab packs?

Yes

No

N/A If no, skip to question 23

21. Are there Appendix IV or Appendix V wastes in these lab packs?

Yes No

N/A

268.7(a)(7)&(8)

22. Are alternate treatment standards being applied?

Yes No

N/A If no, are the proper waste/constituent specific treatment standards being applied? Yes No

If yes -

Has the generator notified the treatment facility, in writing, of all waste codes contained in the lab packs? Yes No

Has the generator stated that its lab pack is an Appendix IV or Appendix V lab pack and certified that hazardous wastes contained therein are listed in the applicable appendix? Yes No

268.7(a)(4)

23. Does the facility treat any of its hazardous wastes in 90 day tanks or containers to meet the applicable treatment standards?

Yes No

If yes, has the facility prepared a waste analysis plan which includes frequency of testing? Yes No N/A

268.7(a)(1)

24. Has the generator submitted notifications to the treatment facility if its waste does not meet applicable treatment standards?

Yes No N/A

If yes, is there any evidence to indicate that the facility has not referenced the appropriate treatment standards in its notifications? Yes No

A-1 PLATING
MDR003101847
EUGENE DEJOISE

If yes, describe:

LDR NOTIFICATIONS OUTLINE THAT FOOD WASTES FALL
WITHIN THE STANDARDS WITHIN 40 CFR 261.41(a) AND 268.43(a). BUT
PART
NO TREATMENT STANDARD CONCENTRATIONS ARE LISTED PER SE.

268.7(a)(1)(ii)

25. Does the facility specify in its notifications the actual treatment standards (ie not referencing them) for F001 - F005 wastes? Yes No N/A

268.7(a)(2)

26. Does the facility submit both a notification and certification to the disposal facility that its waste can be land disposed, if it meets the appropriate treatment standards?

Yes No N/A

268.7(a)(5) 268.7(a)(7)

27. Has the generator retained in on-site files the following materials:

a) all data used to determine whether its waste is restricted or meets applicable treatment standards upon generation, including knowledge of waste and test results? Yes No

b) copies of all notices and certifications that were sent to treatment/disposal facilities? Yes No

55 FR 22662(A.1) 268.7(a)(6)

28. If the generator treats a restricted waste in a WWTP having an NPDES permit, is there a statement in its operating log indicating that the WWTP is treating a RCRA restricted waste?

Yes No N/A

Additional Comments FOOD TREATMENT SLUDGE WITH
PROBABLE CONCENTRATIONS OF NICKEL AND CARMIUM,



ER-WM-t1 REV. 1/91

Bureau of Waste Management
P. O. Box 8550
Harrisburg, PA 17105-8550
OFFICIAL PENNSYLVANIA MANIFEST FORM

ENVIRONMENTAL RESOURCES AND CHEMOTHERAPEUTIC WASTE.

Form approved.
OMB No. 2050-0039
Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of /	Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address		A-1 PLATING CO., INC. 3115 HAMPTON ST., BALTIMORE, MD 21224				
4. Generator's Phone (710) 327 5552		6. US EPA ID Number				
5. Transporter 1 Company Name		DELAWARE CONTAINER P-AID 064375470				
7. Transporter 2 Company Name		8. US EPA ID Number				
9. Designated Facility Name and Site Address		10. US EPA ID Number				
ENVIRITE CORP 1633 PENNVALLEY AVE. YORK, PA 17404		PHD010154045				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers				
a.	R.Q. HAZ. AT DOWS WHATE- 33410-005 DRUG NAPISI (FOOD)	No.	Type	13. Total Quantity	14. Unit WL/Vol	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
Pack	Physical State	Lab Pack	Physical State	a.	c.	
a. <input type="checkbox"/>	SL	H	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. <input type="checkbox"/>			<input type="checkbox"/>		<input type="checkbox"/>	
15. Special Handling Instructions and Additional Information		MD# 91A 3056 CAR# 8057 5				
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name		Signature		MONTH	DAY	YEAR
MARK A TAYLOR				01	23	97
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		MONTH	DAY	YEAR
DAVID B. COY				01	28	97
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		MONTH	DAY	YEAR
19. Discrepancy Indication Space						
13860# ENVIRON SCALE						
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		MONTH	DAY	YEAR
David C Hall				01	03	97

PAC 5587993

TICKET # 122

ENVIRITE CORP.
1600 PENNSYLVANIA AVE
YORK CITY INDUSTRIAL PARK
YORK, PA. 17404
PHONE 717 846 3900

DATE TIME

01/28/92 15:08

GROSS WEIGHT M 58820 LBS

TARE WEIGHT 44960 LBS

NET WEIGHT 13860 LBS

TRUCK ID # 270327

**LAND DISPOSAL
NOTIFICATION/CERTIFICATION
FORM**

ENVIRITE

CORPORATION



CUSTOMER INFORMATION:

Generator Name: A-1 Plating Co., Inc.

Pickup Address: 7134 Belair St., Baltimore, MD 21212

Generator EPA ID #: MD 05101847 Manifest Document # per Item 1/Item A: 12892 / ENR 5687992

Envirite Waste Stream #'s: 11a. CS0749 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE*			TREATABILITY INFORMATION PER 40 CFR†				
	EPA WASTE CODE	SUBCATEGORY	TREATABILITY GROUP	268.41(a)	268.43(a)	268.42(a)(1) TABLE 1 & TABLE 2	NICKEL** ≥134 mg/l	THALLIUM** ≥130 mg/l
11a		Acid - Cyanide		✓	✓			
11b								
11c								
11d								

* Subcategory references to "Acid," "Alkaline," "Reactive Cyanides," and "Reactive Sulfides" are understood to be respectively Acid Subcategory – 261.22(a)(1), Alkaline Subcategory – 261.22(a)(1), Reactive Cyanides – 261.23(a)(5), and Reactive Sulfides – 261.23(a)(5). Waste analysis data, where available, accompanies this shipment.

† unless otherwise specified. Also, a "✓" or an "X" relates the CFR sections and paragraphs where the treatment standards appear. When required, the five-letter treatment code is specified.

** in liquid hazardous wastes including free liquids associated with any solid or sludge containing this metal (or element). See RCRA section 3004(d).

≥ denotes "greater than or equal to."

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated does not meet applicable treatment standards set forth in 40 CFR 268 Subpart D or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d); and 2) to apprise the facility of the CFR section(s) and paragraph(s) where the treatment standards appear and, where applicable, the prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Printed Name: _____ Signature/Date: _____ / _____

SECTION 2: Restricted Wastes from Generators That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

SECTION 3: Restricted Wastes from Treatment Facilities That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

REV 1-7/90

RETURN ORIGINAL TO RECEIVING FACILITY—RETAIN COPY FOR YOUR FILES



HAZARDOUS WASTE MANIFEST

Department of the Environment

Hazardous & Solid Waste Management Administration
2500 Broening Highway Baltimore, MD 21224

Hazardous Waste Program

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9/30/91

Emergency or spill, immediately call the National Response Center at (800) 448-8002 and the MDE at (301) 631-3386. Nights and Holidays at (301) 974-3551

In case of emergency or spill, immediately call the National Response Center at (800) 448-8002 and the MDE at (301) 631-3386. Nights and Holidays at (301) 974-3551

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MDDP00311011847b0741	Manifest Document No. 	2. Page 1 of /	Information in the shaded areas is not required by Federal law.				
3. Generator's Name and Mailing Address A-1 PLATING CO., INC 311 S. HAVEN ST BALTIMORE, MD 21224				A. State Manifest Document Number MDC 0295718					
4. Generator's Phone (301) 327-5552				B. State Generator's ID					
5. Transporter 1 Company Name DELAWARE CONTAINER CO		6. US EPA ID Number PA D0641375470		C. State Transporter's ID					
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone					
9. Designated Facility Name and Site Address EALVITE CORP 2050 CENTRAL AVE, S.E. CANTON, OH 44707		10. US EPA ID Number PHD980568992 OH8h5E8		E. State Transporter's ID					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol				
a. KC HAZARDOUS WASTE SOLID NOS. ITEM # NA9189 (EPA#)		No.	Type	456	L				
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above									
a. <input checked="" type="checkbox"/>	Haz. Code <input checked="" type="checkbox"/>	Physical State <input checked="" type="checkbox"/>	Specific Gravity <input checked="" type="checkbox"/>	Percentage <input checked="" type="checkbox"/>	b. <input type="checkbox"/>	Haz. Code <input type="checkbox"/>	Physical State <input type="checkbox"/>	Specific Gravity <input type="checkbox"/>	Percentage <input type="checkbox"/>
b. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	d. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
K. Handling Codes for Wastes Listed Above									
a. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	c. <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Special Handling Instructions and Additional Information GH. 0 408-HW									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.									
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name MARK A. ZAHN		Signature Mark A. Zahn		Month	Day	Year			
Date 10/10/91									
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name William A. Root		Signature William A. Root		Month	Day	Year			
Date 10/10/91									
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name		Signature		Month	Day	Year			
19. Discrepancy Indication Space Shipment OK.									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name		Signature John Eichhardt		Month	Day	Year			

**LAND DISPOSAL
NOTIFICATION/CERTIFICATION
FORM**

ENVIRITE

CORPORATION



CUSTOMER INFORMATION:

Generator Name: A-1 Plating Co., Inc

Pickup Address: 311 S. Haven St., Baltimore, MD 21224

Generator EPA ID #: MD003101847 Manifest Document # per Item 1/Item A: 00791 / ATPC0295718

Envirite Waste Stream #'s: 11a. CS0749 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE*			TREATABILITY INFORMATION PER 40 CFR†				
	EPA WASTE CODE	SUBCATEGORY	TREATABILITY GROUP	268.41(a)	268.43(a)	268.42(a)(1) TABLE 1 & TABLE 2	NICKEL** ≥134 mg/l	THALLIUM** ≥130 mg/l
11a)	F-0362		100-261.22-12	✓	✓			

* Subcategory references to "Acid," "Alkaline," "Reactive Cyanides," and "Reactive Sulfides" are understood to be respectively Acid Subcategory—261.22(a)(1), Alkaline Subcategory—261.22(a)(1), Reactive Cyanides—261.23(a)(5), and Reactive Sulfides—261.23(a)(5). Waste analysis data, where available, accompanies this shipment.

† unless otherwise specified. Also, a "✓" or an "X" relates the CFR sections and paragraphs where the treatment standards appear. When required, the five-letter treatment code is specified.

** in liquid hazardous wastes including free liquids associated with any solid or sludge containing this metal (or element). See RCRA section 3004(d).

≥ denotes "greater than or equal to."

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated does not meet applicable treatment standards set forth in 40 CFR 268 Subpart D or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d); and 2) to apprise the facility of the CFR section(s) and paragraph(s) where the treatment standards appear and, where applicable, the prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Printed Name: John A. Rath Signature/Date: 24/08/01 / 1/12/03/01

SECTION 2: Restricted Wastes from Generators That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

SECTION 3: Restricted Wastes from Treatment Facilities That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed Name: _____ Signature/Date: _____ / _____

REV1-7/90

RETURN ORIGINAL TO RECEIVING FACILITY – RETAIN COPY FOR YOUR FILES

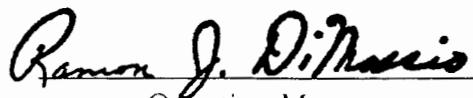
NONHAZARDOUS CERTIFICATION

This is to certify that HAZARDOUS SOLID waste received 03/26/91 from A-1 PLATING on manifest # MDC 0295717 has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting petition granted by the U.S. EPA November 6, 1986.

Having changed this hazardous waste into a nonhazardous material, Envirite Corporation has eliminated all A-1 PLATING'S future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).



Geoffrey Stengel, Jr.
President



Ramon J. DiNuccio
Operations Manager

ENVIRITE

Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

AND CHEMOTHERAPEUTIC WASTE.

ER-WM-51 REV. 1/91

Form approved.

OMB No. 2050-0039

Expires 9-30-92

OFFICIAL PENNSYLVANIA MANIFEST FORM

YS 0327

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IMDD003101847160892	Manifest Document No. 	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.		
3. Generator's Name and Mailing Address A1 Platinum Co. Inc. 311 S. Haven St. Baltimore Md. 21224				A. State Manifest Document Number PAC 6198032			
4. Generator's Phone (410) 327-5552		6. US EPA ID Number PAD010154045		B. State Gen. ID			
5. Transporter 1 Company Name Envirite Corp		8. US EPA ID Number		C. State Trans. ID PA-1AH10131			
7. Transporter 2 Company Name				D. Transporter's Phone (717) 896-1900			
9. Designated Facility Name and Site Address Envirite Corporation 1600 Penna Ave. York, Pa 17401		10. US EPA ID Number PAD010154045		E. State Trans. ID PA-			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. Hazardous Waste Solid. NOS ORM-E NA9189		(F006)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above Lab Pack Physical State		Lab Pack	Physical State	K. Handling Codes for Wastes Listed Above 502 D51			
a. <input type="checkbox"/> <input checked="" type="checkbox"/> S		<input type="checkbox"/> c.	<input type="checkbox"/> <input checked="" type="checkbox"/> S	a. T21	b.	c.	d.
b. <input type="checkbox"/> <input type="checkbox"/> S		<input type="checkbox"/> d.	<input type="checkbox"/> <input type="checkbox"/> S				
15. Special Handling Instructions and Additional Information M1=92A2845 24hr Emergency # 410 325 5552 Driver = 0209 ERG#31							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.							
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name John P. Hess		Signature 		MONTH	DAY	YEAR	106 08 92
TRANSPORTER 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name John P. Hess		Signature 		MONTH	DAY	YEAR	106 08 92
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		MONTH	DAY	YEAR	
FACILITY 19. Discrepancy Indication Space 17560 ft per Envirite scale							
ITY 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Barbara Fuercher		Signature 		MONTH	DAY	YEAR	06 08 92

LAND DISPOSAL
NOTIFICATION/CERTIFICATION
FORM

ENVIRITE

CORPORATION



CUSTOMER INFORMATION:

Generator Name: A/I Plating Co.

Pickup Address: 311 S. Haven St. Baltimore, Md. 21224

Generator EPA ID #: MDD003101847 Manifest Document # per Item 1/Item A: 60892 PAC 6198032

Envirite Waste Stream #'s: 11a. YS#0327 11b. _____ 11c. _____ 11d. _____

MANIFEST ITEM NUMBER	DESCRIPTION OF WASTE*			TREATABILITY INFORMATION PER 40 CFR†				
	EPA WASTE CODE	SUBCATEGORY	TREATABILITY GROUP	268.41(a)	268.43(a)	268.42(a)(1) TABLE 1 & TABLE 2	NICKEL ** ≥ 134 mg/l	THALLIUM** ≥ 130 mg/l
11a.	F006		Non HAZ Waste White	X	X			

* Subcategory references to "Acid," "Alkaline," "Reactive Cyanides," and "Reactive Sulfides" are understood to be respectively, Acid Subcategory - 261.22(a)(1), Alkaline Subcategory - 261.22(a)(1), Reactive Cyanides - 261.23(a)(5), and Reactive Sulfides - 261.23(a)(5). Waste analysis data, where available, accompanies this shipment.

† unless otherwise specified. Also, a "✓" or an "X" relates the CFR sections and paragraphs where the treatment standards appear. When required, the five-letter treatment code is specified.

** in liquid hazardous wastes including free liquids associated with any solid or sludge containing this metal (or element). See RCRA section 3004(d).

≥ denotes "greater than or equal to."

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated does not meet applicable treatment standards set forth in 40 CFR 268 Subpart D or exceeds the applicable prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d); and 2) to apprise the facility of the CFR section(s) and paragraph(s) where the treatment standards appear and, where applicable, the prohibition levels set forth in 40 CFR 268.32 or RCRA section 3004(d).

Printed Name: George Meadows Sr Signature/Date: George Meadows Sr 6-8-92

SECTION 2: Restricted Wastes from Generators That Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the receiving facility specified on the referenced manifest that the waste indicated can be land disposed without further treatment; and 2) to certify that the waste meets the standards referenced above and does not exceed the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d).

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Printed Name: _____ Signature/Date: _____ / _____

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Printed Name: _____ Signature/Date: _____ / _____

REV 1-7-90

RETURN ORIGINAL TO RECEIVING FACILITY – RETAIN COPY FOR YOUR FILES

TICKET 1240

ENVIRITE CORP.
1600 PENNSYLVANIA AVE
YORK CITY INDUSTRIAL PARK
YORK, PA. 17404
PHONE 717 846 1900

DATE TIME
06/08/92 17:27

GROSS WEIGHT M 52380 LBS

TARE WEIGHT 34820 LBS

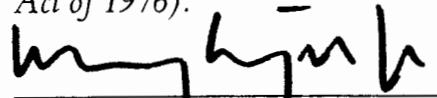
NET WEIGHT 17560 LBS

TRUCK ID # 100327

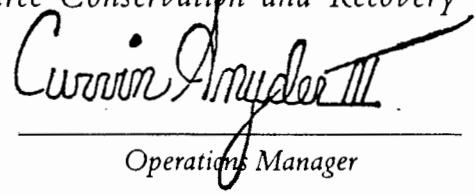
NONHAZARDOUS CERTIFICATION

This is to certify that Wastewater Treatment Sludge waste received 6-8-92 from A-1 Plating Co., Baltimore, MD on manifest # PAC 6198032 has been rendered nonhazardous in full compliance with the terms of Envirite Corporation's delisting petition granted by the U.S. EPA November 6, 1986, and the State of PA on Nov. 5, 1981.

Having changed this hazardous waste into a nonhazardous material, Envirite Corporation has eliminated all A-1's future hazardous waste liability for this material under RCRA (Resource Conservation and Recovery Act of 1976).



Geoffrey Stengel, Jr.
President



Operations Manager

ENVIRITE

Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462

RECEIVED**A-1 PLATING COMPANY, INC.
HAZARD COMMUNICATION PROGRAM****JUN 22 1992****HSWMA
ENFORCEMENT PROGRAM****I. Right To Know Training.**

- A. General Safety in the Workplace
- B. Precautions for Chemical Handling
- C. Electrical Hazards
- D. Other Hazards
- E. Obtaining and Using Hazard Information
- F. Chemical Storage

II. Waste Handling Training.

- A. Common Waste
- B. Hazardous Waste

III. Safety Policies Training.

- A. Plantwide Safety Rules
- B. Accident Recordkeeping
- C. Safety Inspections
- D. Safety Meetings

IV. Contingency Plan and Emergency Procedures Training.

- A. The Emergency Coordinator
- B. Considerations During an Emergency
- C. Considerations After an Emergency

V. Education Requirements

- A. Initial Training
- B. Annual Training
- C. Supplemental Training
- D. Documentation of Training Efforts

March 23, 1991

Page 2

Right To Know Training

General Provisions

The objective of this training is to inform employees about appropriate safety measures that must be taken to protect themselves in the workplace. To accomplish this, information about general safety practices as well as precautions required with hazards that are present in a metal finishing workplace will be presented.

I. Avoiding Accidents

A. Causes of accidents

1. Carelessness
 - a. Improper attitude about safety
 - b. Negligence
2. Lack of knowledge
 - a. Improper protection
 - b. Chemical reactions

B. Remedies

1. Be mindful of known safety precautions
2. Encourage others to follow your example
3. Wear appropriate safety gear
4. After training, make an effort to maintain a working knowledge of hazards.

C. Prevention

1. Keep your environment clean
2. If you become aware of an unsafe condition, either correct it yourself or inform management about the condition

D. In case of an accident

1. First aid kit is in the shipping office
2. Take other appropriate measures

II. Precautions for Chemical Handling

A. Caustics and Alkaline Cleaners

1. Highly aggressive to eyes and skin - wear glasses, gloves and an apron, as well as boots.
2. In case of contact, flush the area immediately and make someone else aware of the incident.
3. When making an addition - add slowly and stir, otherwise heat generated can cause an explosion.
4. Avoid an excessive foam blanket on electrocleaners - a spark can cause an explosion.

B. Acids and Acid Processing solutions

1. Aggressive to eyes and skin - wear glasses, gloves and an apron, as well as boots.
2. In case of contact, flush the area immediately and make someone else aware of the incident.
3. When diluting sulfuric acid - add slowly and stir, otherwise heat generated can cause an explosion.
4. Never add water to concentrated acid - spattering can occur.

March 29, 1991

Page 3

C. Cyanides and Cyanide Processing Solutions

1. Cyanide materials are poisonous, and contact with acid liberates deadly hydrocyanic acid gas.
 2. Cyanide can be absorbed through the skin - wear glasses, gloves and an apron, as well as boots.
 3. When handling this type of material, wear a mask to avoid inhaling "dust".
 4. For skin contact - flush area with plenty of water, and make someone else aware of the incident.
 5. Low doses will turn lips and fingernails blue, leading to suffocation.
 6. Antidote is amył nitrite.
- B. Oxidizing and Reducing Agents
1. Risk of fire or explosion
 2. Oxidizers - nitric acid, chromic acids, hydrogen peroxide, bleach
 3. Reducing agents - ferrous sulfate, sodium bisulfite

III. Electrical Hazards

- A. AC voltage - used everywhere for motors, lights, rectifiers - high voltage can cause electrocution.
- B. DC voltage - used for electrocleaning and plating processes - relatively low voltage, the shock hazard comes from AC ripple that leaks through
- C. Grounding
 1. Don't handle electrical items while standing in water or with wet hands
 2. Do not immerse live AC electrical items in liquids.

D. Lockout/Tagout**IV. Other hazards**

- A. Overflowing tanks can cause slippery surfaces and make electrical equipment dangerous
- B. Overhead hoists require hard hat protection
- C. Lifting heavy objects - use your legs or get help

V. Obtaining and Using Hazard Information**A. Material Safety Data Sheets**

1. Standard forms that explain special hazards associated with specific chemicals
2. Stored in lunch room area
3. Available at any time

B. Hazardous Chemicals List

1. Any item on this list is acknowledged to present acute hazards to health.
2. Stored with MSDS's
3. Available at any time

C. Labeling system

1. All tanks, drums, buckets and other containers must have a label depicting the class of hazard that is associated with the material contained.
2. If you find a container that is not labeled, or that is improperly labeled, alert your supervisor and see that the problem is corrected.

March 23, 1991

Page 4

VI. Chemical storage

- A. Keep containers off of the floor
- B. Separate the following
 - 1. Acids and cyanides
 - 2. Acids and alkalines
 - 3. Oxidizing and reducing agents
 - 4. Flammables and combustibles

March 29, 1991

Page 5

Handling of Waste

General Provisions:

One of the unavoidable outcomes of metal finishing processes is the creation of waste, both common and hazardous. The objective of this training is to educate employees about the distinction between the two and the proper handling of either type.

I. Common waste:

A. Sources

1. Used food and drink containers
2. Materials used in packaging of parts
3. Paper towels and other trash

B. Disposal

1. Place in a trash can or, if liquid, pour into sink
2. See that such containers are not overflowing
3. Do not allow this waste to come in contact with hazardous waste; it then becomes hazardous waste

II. Hazardous Waste

A. Sources

1. Contaminated common waste
2. Sludge from processing tanks and other containers
3. Spent processing solutions
4. Used filter cartridges

B. Handling

1. First, identify the waste
2. Wear protective gear
3. Place in appropriate location
4. Alert waste treatment personnel that the waste exists
5. Never dispose of this type of material without direct instruction

C. Disposal - never dispose of this type of material without direct instruction

March 23, 1991

Page 6

Safety Policies Training

General Provisions:

In order to create and maintain the safest possible working environment, it is helpful to establish guidelines that reflect the company's and employees' commitment to safety. What follows is an expression of our commitment to a safe workplace.

I. Plantwide practices

- A. Safety glasses shall be worn at all times.
- B. Smoking is not permitted in the shop.
- C. Food and drink are not permitted in the shop.
- D. Work areas must be kept clean and free of trash.
- E. Proper safety practices associated with hazardous chemicals must be followed.

II. Accident recordkeeping

- A. A record of any accident requiring outside assistance must be made.
- B. These records must be maintained on file for three years.

III. Safety inspections

- A. At regular intervals, or upon request of an employee, safety inspections will be conducted to uncover hazardous conditions that exist.
- B. Any unsafe condition found will be documented and corrected in a suitable manner as soon as is possible.

IV. Safety meetings

- A. Two people will be named as Safety Coordinators for the plant.
- B. Once every month, a safety meeting will be held to highlight current issues and provide ongoing training.

S. M.

March 23, 1991

Page 7

Contingency Plan and Emergency Procedures Training

展望と予測 Projections

In an emergency that poses a threat to workers in the plant, efforts must be made to quickly respond and restore safe conditions. A-1 Plating Co., Inc. has developed a plan that will provide for responsible and orderly management of such a crisis.

3. The Emergency Coordinators

- A. Is responsible for carrying out the Contingency Plan.
 - B. Is to be notified as soon as an emergency is discovered.
 - C. Has authority over all employees in an emergency.

II. Considerations during an emergency

A. Evacuation

1. Plant - if necessary shall be along the routes described in the Contingency Plan.
 2. Outside of A-1 property - it is possible that some homes and local businesses may require evacuation.

B. Containment of any spills or leaks

- C. Notification of appropriate authorities
 - D. Identification of the character and source of the event
 - E. Monitoring during an emergency for gas leaks, ruptured pipes, electrical faults, etc.

III. Considerations after an emergency

- A. Care must be taken to see the no incompatible waste is mixed.
 - B. All emergency equipment must be fit for its intended use before operations are resumed.

March 23, 1991
Rev. 06-22-92

Page 8

Education Requirements

General Provisions:

In order to maintain the highest level of safety possible, an ongoing means of education concerning hazards and safe practices is established. This document may be revised at any time to reflect changes in practices, discovery of new hazards and recognition of existing hazards that have been overlooked. All employees must be reminded of the role that they play in providing a safe place to work.

- I. Initial Training - The Hazard Communication Program will be presented to all new employees.
- II. Annual Training - All employees will undergo an annual review of the material in the Hazard Communication Program.
- III. Supplemental Training - Employees are encouraged to take advantage of Red Cross CPR, First Aid and other programs.
- IV. Emergency Equipment Training
 1. Use and inspection of facility emergency equipment.
 2. Procedure for repair or replacement of emergency equipment.
- V. Wastewater Discharge Monitoring Equipment Reading, Use, and Emergency Shutdown Procedure.
- VI. Documentation of Training Efforts - Employees are required to sign a document indicating whenever they receive training under the A-1 Hazard Communication Program.

RECEIVED

JUN 22 1992

DUMPSTER CHECK

DATE	CHECK FOR LEAKS	DUMPS	COVERED	REMARKS	HSWMA ENFORCEMENT PROGRAM
5/21/92	No Leaks	No	OK	OK	
5/22/92	No Leaks	YES	OK	OK	
5/25/92	Memorial Day	Closed	—	—	
5/26/92	No LEAKS	No	OK	OK	
5/27/92	No Leaks	No	OK	OK	
5/28/92	No Leaks	No	OK	OK	
5/29/92	No Leaks	YES	OK	OK	
6/1/92	No Leaks	No	OK	OK	
6/2/92	No Leaks	No	OK	OK	
6/3/92	No Leaks	No	OK	OK	
6/4/92	No Leaks	YES	OK	OK	
6/5/92	No Leaks	No	OK	End V	
6/8/92	No Leaks	yes	OK	End V	Dumpster pick up
6/9/92	No Leaks	No	OK	End V	
6/10/92	No Leaks	No	OK	End V	
6/11/92	No Leaks	No	OK	End V	
6/12/92	No Leaks	yes	OK	End V	
6/15/92	No Leaks	No	OK	OK	
6/16/92	No Leaks	No	OK	OK	
6/17/92	No Leaks	No	OK	OK	
6/18/92	No Leaks	No	OK	OK	
6/19/92	No Leaks	YES	OK	OK	